

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ROBERT BRESLOW AND MONICA BRESLOW,)	
)	
)	
PLAINTIFFS,)	
)	
v.)	C.A. No. 18-908-RGA
)	
JOHN H. KLEIN,)	
)	
DEFENDANT.)	

**STIPULATION AND [PROPOSED] ORDER OF VOLUNTARY
DISMISSAL WITH PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a), the parties hereby stipulate and agree that all claims asserted in the above-captioned action are hereby dismissed with prejudice. All fees, costs, and expenses relating to this litigation (including attorneys' fees and expenses) shall be borne solely by the party incurring same.

/s/ Lisa A. Schmidt

Lisa A. Schmidt (#3019)
Jeffrey L. Moyer (#3309)
Matthew D. Perri (#6066)
RICHARDS, LAYTON & FINGER, P.A.
One Rodney Square
920 North King Street
Wilmington, DE 19801
(302) 651-7700
schmidt@rlf.com
moyer@rlf.com
perri@rlf.com

OF COUNSEL:

Joseph L. Fogel (*pro hac vice*)
Michael P. Kornak (*pro hac vice*)
FREEBORN & PETERS LLP
311 South Wacker Drive, Suite 3000
Chicago, Illinois 60606

/s/ Andrew L. Cole

Andrew L. Cole (#5712)
Bradley P. Lehman (#5921)
Cole Schotz P.C.
500 Delaware Avenue, Suite 1410
Wilmington, DE 19801
(302) 651-2006 (Phone)
blehman@coleschotz.com
acole@coleschotz.com

OF COUNSEL:

Steven R. Klein (*pro hac vice*)
Rachel A. Mongiello (*pro hac vice*)
Cole Schotz P.C.
Court Plaza North
25 Main Street
P.O. Box 800
Hackensack, NJ 07602-0800
(201) 489-3000 (Phone)

(312) 360-6000
jfogel@freeborn.com
mkornak@freeborn.com

*Attorneys for Plaintiffs
Robert Breslow and Monica Breslow*

sklein@coleschotz.com
rmongiello@coleschotz.com

Attorneys for Defendant John H. Klein

Dated: October 2, 2019

IT IS SO ORDERED this _____ day of _____, 2019.

THE HONORABLE RICHARD G. ANDREWS
UNITED STATES DISTRICT JUDGE